

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT

IN RE SCOTT JOSEPH STRUCINSKI,

Debtor.

CASE NO. 09-72282-SWR
CHAPTER 7
(Converted from Chapter 13)
HON. Steven W. Rhodes

**OBJECTION TO DEBTOR'S MOTION FOR REDEMPTION ON BEHALF OF
CONSUMER PORTFOLIO SERVICES, INC.**

NOW COMES Consumer Portfolio Services, Inc., by and through its attorneys, the Law Offices of Richard A. Green, and for its Objections to Debtor's Motion for Redemption states as follows:

1. Admitted.
2. Admitted.
3. Lacking sufficient knowledge or information on which to form a belief, Consumer Portfolio Services, Inc. neither admits nor denies the allegations in paragraph 3 of Debtor's Motion and leaves Debtor to his proofs.
4. Admitted.
5. Lacking sufficient knowledge or information on which to form a belief, Consumer Portfolio Services, Inc. neither admits nor denies the allegations in paragraph 5 of Debtor's Motion and leaves Debtor to his proofs.
6. Denied. In further response, Consumer Portfolio Services, Inc. asserts that the market value of the 2002 Saturn SL, VIN 1G8ZK52742Z179094 is approximately \$4,325.00 and the valuation of said vehicle proposed in Debtor's Motion is insufficient [see Exhibit 1].

WHEREFORE, Consumer Portfolio Services, Inc. requests that the Court require a value for the 2002 Saturn SL of \$4,325.00 for redemption under 11 U.S.C. §722 or grant relief from the automatic stay.

DATED: November 20, 2009

RESPECTFULLY SUBMITTED,

/s/ Richard A. Green
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